



California Fair Political Practices Commission

March 20, 1991

Robert M. Leventhal
P.O. Box 2926
Culver City, CA 90231-2926

Re: Your Request for Confirmation
of Telephone Advice
Our File No. A-91-105

Dear Mr. Leventhal:

You have requested confirmation of telephone advice provided to you concerning the conflict of interest disclosure provisions of the Political Reform Act.^{1/}

Your letter correctly summarizes my advice. As required under the conflict of interest code for the City of Los Angeles, you must disclose your interest in and income received by Robert Leventhal Inc. as described below. This response assumes that Robert Leventhal Inc. is a sole proprietorship.

Schedule A-Investments: If your investment in Robert Leventhal Inc. was \$1,000 or more during the reporting period, the business entity must be disclosed on Schedule A.

Schedule D-Income: You must disclose on Schedule D the salary or other income you received during the reporting period from Robert Leventhal Inc. as well as the gross income received by Robert Leventhal Inc.

Schedule G-Business Positions: You must disclose your business position with Robert Leventhal Inc. on Schedule G.

^{1/}Government Code Sections 81000-91015. All statutory references are to the Government Code unless otherwise indicated. Commission regulations appear at 2 California Code of Regulations Section 18000, et seq. All references to regulations are to Title 2, Division 6 of the California Code of Regulations.

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Schedule H-2-Income and Loans to a Business Entity or Trust:
If Robert Leventhal Inc. received gross income of \$10,000 or more from any one source during the reporting period, and the source is of the type required to be disclosed under your disclosure category, you must report the source of the income on Schedule H-2.

If you have any questions or need further assistance, please contact me at (916) 322-5662.

Sincerely,

Scott Hallabrin
Acting General Counsel

A handwritten signature in black ink, appearing to read "Colleen McGee". The signature is fluid and cursive, with the first name "Colleen" being more prominent than the last name "McGee".

by: Colleen McGee
Political Reform Consultant
Technical Assistance and
Analysis Division

Enclosure

ROBERT M LEVENTHAL
Labor Management Dispute Resolution
Post Office Box 2926 Culver City Ca. 90231-2926
(213) 559-9382

Feb. 15, 1991

Scott Hallbran
Acting, General Council
FPFC
Post Office Box 807
Sacramento, Ca. 95804-0807

Re: Form 730

Dear Mr. Hallbran:

In an effort to properly complete the form 730 I called and spoke to one of your staff members for guidance.

My status is a member of the Los Angeles City Employee Relations Commission. My occupation is that of a labor arbitrator. In my arbitration practice I may perform services for up to 150 different sets of parties in a year (therefore 300 entities) and the fee from each would exceed \$250.00. An initial reading of the form could be construed that I would have to somehow list all 300 or more.

However, many years ago I formed Robert M Leventhal Inc., a personal service corporation. All fees received are paid to the corporation and the corporation pays me a salary.

Based on my discussion with your staff it is my understanding that I am in compliance if;

I identify the Corporation as a business entity on Schedule A.

I List the Corporation and income therefrom on Schedule D.

I list my position in the Corporation on Schedule G.

I identify on Schedule H-2 any party that paid \$10,000.00 or more to the corporation.

I would appreciate a written response or copy of advice letters you have on file that will confirm the above is a proper way to report my business income.

Respectfully,


Robert M Leventhal